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Subject: Talking Points - Columbia River Preliminary Draft Temperature
TMDL-Sept 13 Public Release 

Here are the talking points for EPA/state/tribal managers developed by EPA and the Washington Ecology
to use for the public release on September 13 of the Preliminary Draft Columbia River Temperature
TMDL.

We agreed that we would not do any pro-active announcement of the availability of this preliminary draft
but EPA/state/tribal managers would have a "crib sheet" in case we got any calls.

Hope this is helpful.....



talking points #2.wpd talking points #2.doc

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Draft Talking Points on the Preliminary Draft Columbia/Snake Mainstem Temperature TMDL

Public Release - September 13, 2003

Talking points prepared by EPA and Ecology - September 11, 2002

- The Columbia/Snake River Mainstem Temperature TMDL that is being released on September 13, 2002, is a preliminary draft. This preliminary draft was developed by EPA with technical review, assistance and support by staff from the Oregon DEQ, Idaho DEQ and Washington Ecology. Input was received as well from the some of the Columbia River tribes. The final draft for formal public review will be issued on late October 2002 after considering comments and suggestions received on this preliminary draft.
- There was not a formal public advisory group on this TMDL effort and instead a series of six public meetings were held in 2001 and 2002 in Oregon, Washington and Idaho. Input received at these meetings was incorporated into this Preliminary Draft.
- The technical analysis in the preliminary draft TMDL shows that some of the larger dams bear the major responsibility for improving temperature because they are the biggest causes of the temperature problem. According to this technical analysis some of the large dams impact the river well in excess of the allowable limits in the water quality standards. In contrast, the impacts of the industrial and municipal points sources along the mainstems are within the allowable limits in the standards. Because of their large influence on river conditions and their large contribution to the temperature problem, the draft TMDL allocations place the burden of improving temperature on a few of the dams.
- The purpose of releasing this preliminary draft to the public and holding public workshops is to receive feedback on the appropriateness of the methodology for the development of the load allocations. EPA and the states would like to have a vigorous discussion of the methodology for allocations and potential solutions for restoration of Columbia River state and tribal water quality standards.
- We are open to making appropriate changes before we issue the formal draft and welcome comments to improve the Final Draft TMDL. We will not be responding formally to comments received.
- This preliminary draft TMDL establishes Waste Load Allocations for existing point sources at their current loads as determined by the current permitting authority (WA, OR or EPA). Current load was determined on typical worst case conditions and do not consider outlier conditions. The states have provided this

preliminary analysis which could change when more detailed information is available.

- The TMDL sets an upper bound on temperature from point sources. Point source NPDES permit limits for temperature will also be based on state mixing zone and minimum technology requirements. Those requirements could be more restrictive than the TMDL, however this analysis will be performed during permit development and not as a part of this TMDL. We cite these requirements in the TMDL to be clear that the TMDL allocations do not supercede other permitting requirement for thermal discharges.
- The wasteload and load allocation specific in the final TMDL will be considered for achievement through implementation strategies developed by each state. We anticipate that restoration of the Columbia and Snake Rivers will be a long term process. Temperature improvements, by those causing unnatural conditions, that assist in restoring healthy populations of endangered species will be a main focus of initial efforts.

TMDL Public Workshops/Informational Meetings on Preliminary Draft Temperature TMDL

September 25 - Lewiston, ID - Red Lion Inn, 621 21st Street, 9 - 3 pm

September 26 - Kennewick, WA - Washington Department of Ecology
Kennewick office, 1315 W 4th Ave., 9 - 3 pm

October 1 - Portland, OR - Oregon State Office Building, Room 120, 800 NE
Oregon Street, 12:30 - 5 pm

TMDL Schedule:

October 2002	Draft TMDL issued
Nov/Dec/Jan	90 Day comment period/formal public meetings
Feb/March/April	Respond to comments
May 2003	Final Temperature TMDL issued

Website for more information:

<http://www.epa.gov/r10earth/columbiainstementmdl.htm>